

Williams Cattle Company LLC
144 General Early Dr.
Suffolk, VA 23434

November 5, 2010

Docket ID #: EPA-R03-OW-2010-0736

Dear Sirs:

We would like to submit these comments to the EPA draft Chesapeake Bay TMDL:

1. We do not believe the Chesapeake Bay Model being used to estimate nutrient and sediment runoff to the bay is based on accurate data. WE believe EPA should not move ahead with costly mandates until flawed modeling and data are corrected and until the science and data have been proven.
2. We believe the cost of the Bay TMDL will be excessive in light of the current economic conditions for cities, counties and the agriculture community. We believe the EPA must conduct a non-biased economic impact analysis of the cost for all sectors, public and private, to meet the proposed standards. We believe the federal government must be prepared to fund the mandates which will be required by local governments.
3. We say, "NO!" to the EPA's "backstop" measures in the TMDL regulations. Rather than forcing states to regulate their way out of "backstops" we urge the EPA to allow Virginia to implement its own plans for achieving clean water goals without costly, burdensome regulations.

During the last 20 years on our farm, which is located near the Nansemond River, we have:

1. Installed many acres of buffer strips at our own expense.
2. Installed grade stabilization structures on all erosion sites, a total of eleven structures.
3. Established vegetative waterways where needed.
4. Dispersed and discontinued large swine and cattle operations.
5. Utilized 100% no till on all corn acreage and 90% no till on soybean acreage.
6. Utilized nutrient management plans.
7. Used GPS and auto controls on sprayers to reduce the amounts of chemicals being used.
8. Hired professional crop scouts who assist us in using minimum amounts of chemicals and fertilizers.
9. Utilized cover crops as cost share monies are available.
10. Followed BMP, Best Management Practices, on our wooded acres.

The EPA needs to recognize that the monies and hard work that we have been spending voluntarily to improve the water quality of the run-off from our farm, has to be paid for by the income from the property. The cost of new rules and regulations plus the increases in property taxes for the local government to cover their mandates will impose a harsh burden.

Yours truly,

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